

# Exhibit E

March 05, 2019

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
San Francisco Division

IN RE: )  
)  
CATHODE RAY TUBE (CRT) ) Master File No.  
ANTITRUST LITIGATION ) 07-CV-5944-JST  
)  
) MDL No. 1917  
)  
)  
)  
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DEPOSITION OF ZHANG WENKAI

HIGHLY CONFIDENTIAL

VOLUME II

Tuesday, March 5th, 2019

AT: 9.05 am

Taken at:

Kobre & Kim  
6/F ICBC Tower  
3 Garden Road  
Central  
Hong Kong

Court Reporter:

Bron Williams  
Accredited Real-time Reporter

March 05, 2019

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10                   Also present: Inga Kornev  
11                                   Videographer

12                                   Mr Wu Xiao Juen  
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1 VIDEOGRAPHER: Here begins volume II, disk  
2 number 1 -- excuse me, media number 1 in the deposition of  
3 Zhang Wenkai in the matter of In Re Cathode Ray Tube (CRT)  
4 Antitrust Litigation in the United States District Court,  
5 Northern district of California, San Francisco Division,  
6 Master File No. 07-CV-5944-JST, MDL No. 1917.

7 Today's date is March 5th, 2019, and the time on  
8 the video monitor is 9.05 a.m.

9 The certified video operator today is Inga Kornev,  
10 contracted by US Legal Support. This video deposition is  
11 taking place at Kobre & Kim, located in ICBC Tower, 3  
12 Garden Road, Central, Hong Kong.

13 Counsel please voice identify yourselves and state  
14 whom you represent. And if you are sitting at the table  
15 down the end, please speak up because we don't have  
16 microphones for you.

17 MS. FU: Qianwei Fu from Zelle LLP on behalf of  
18 the indirect purchaser plaintiffs.

19 MR. HWU: David Hwu, from Saveri & Saveri, on  
20 behalf of direct purchaser plaintiffs.

21 MR. BENZ: Stephen Benz from the Kellogg, Hansen  
22 firm in Washington DC for the direct purchaser plaintiffs.

23 MS. CAPURRO: Lauren Capurro, Trump, Alioto, Trump  
24 & Prescott, for the indirect purchaser plaintiffs.

25 MR. MARGO: Benjamin Margo, from the Kellogg,

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1 Hansen firm, for the direct purchaser plaintiffs.

2 MR MONTAÑO: Michael Montaña, Cotchett, Pitre &  
3 McCarthy in Burlingame, California, on behalf of the direct  
4 purchaser plaintiffs.

5 MR. LUCARELLI: Andrew Lucarelli, Baker Botts, on  
6 behalf of the Irico defendants and the witness.

7 MS YANG: Kaylee Yang from Baker Botts, for  
8 defendant.

9 MR. WU: Wu Xiao Juen.

10 VIDEOGRAPHER: Would all others please state your  
11 name for the record.

12 INTERPRETER: Kuang-Shai Chao, I'm the  
13 interpreter.

14 VIDEOGRAPHER: The court reporter today is Bron  
15 Williams on behalf of US Legal Support. Would the reporter  
16 please swear in the interpreters and the witness.

17 INTERPRETER - Mr Kuang-Shai Chao (affirmed)

18 MR DAVID HWU - (affirmed) - acting as a check interpreter

19 MR ZHANG WENKAI

20 having been duly affirmed, testified as follows:

21 (All answers were given through the interpreter unless  
22 otherwise indicated)

23 BY MS. FU:

24 Q. Good morning, and welcome back, Mr. Zhang.  
25 You testified yesterday morning that with regard to this



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1 Q. Are you implying that Irico made a human error  
2 or typo when it submitted this report to the Ministry of  
3 Finance in 2004?

4 MR. LUCARELLI: Object to form.

5 A. I cannot verify how those errors were made.

6 However, with regard to the shareholders'  
7 information, between two different companies, we should  
8 refer to the commerce registration information.

9 BY MS. FU:

10 Q. This exhibit shows, at this time, around 2004,  
11 Group informed the Government, meaning the Ministry of  
12 Finance, it owned CNEICC, correct?

13 MR. LUCARELLI: Object to form.

14 A. No. As I stated earlier, it is a common  
15 standard that when you verify the relationship between two  
16 companies, the fact should be based on the commerce  
17 registration file.

18 BY MS. FU:

19 Q. So when Irico Group created this document,  
20 including the organization chart in attachment 2, are you  
21 saying it did not base its information on the commerce of  
22 registration?

23 MR. LUCARELLI: Object to form.

24 A. I don't know, because I didn't create this  
25 document. Neither do I know who created this document back

1 then.

2 BY MS. FU:

3 Q. So you just said you did not create this  
4 document, you were not the author of this document. So you  
5 are not qualified to say if this is a typo or human error,  
6 correct?

7 MR. LUCARELLI: Object to form.

8 A. That is not correct.

9 If the statement is inconsistent, or it does not  
10 reflect the commerce registration file, then it is  
11 incorrect.

12 BY MS. FU:

13 Q. What does the commerce registration say about  
14 the relationship between Irico Group and CNEICC around 2004?

15 A. They are two individual or separate companies.

16 INTERPRETER: Let me correct. "It is two  
17 independent companies."

18 BY MS. FU:

19 Q. So are you saying in 2004 Group submitted  
20 false information to the Ministry of Finance?

21 MR. LUCARELLI: Objection, misstates testimony.

22 A. I didn't understand your question. Could you  
23 repeat your question?

24 BY MS. FU:

25 Q. Are you saying in 2004 Group submitted false